


Unusual Enrollment History



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Agenda

- History and overview
- Technical information
- Changes for 2015-2016
- UEH data analysis
- UEH review and resolution
- Resources

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Unusual Enrollment History (UEH)

- Beginning with the 2013-14 award year, the Department added an Unusual Enrollment History flag
 - Intended to address possible fraud in the Title IV programs
- We are concerned about an enrollment pattern in which a student:
 - Attends long enough to receive Title IV credit balance funds, then withdraws without completing the enrollment period
 - repeats this pattern at other institutions, enrolling long enough to collect Title IV credit balances but not earning academic credit

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UEH Legislative Authority

• 484(a)(4)(A) of the Higher Education Act requires students to sign a *Statement of Educational Purpose*

- by signing the *Statement of Educational Purpose* (included on the FAFSA), a student certifies that Title IV aid received will only be used to meet educational costs



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UEH Flags

Flag value of 'N'

- Indicates there is no Unusual Enrollment History
 - No 'C' Code, and no action required by the institution

Flag value of '2'

- Indicates an Unusual Enrollment History that requires review of the student's enrollment records at current institution
 - Example: a UEH Flag value of '2' may be generated when a student received Title IV aid at three institutions over two award years

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UEH Flags

Flag value of '3'

- Indicates that the institution must review academic records for the student and, in some instances, must collect additional documentation
 - Example: UEH Flag value of '3' may be generated when a student received Title IV funds at three or more institutions in one award year

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UEH Flag – ISIR

- NSLDS has edits to identify records with Unusual Enrollment Histories

```
XXXXXXXXXXXX XXXXXXXXXXXXXXXX
999-99-9999
CCTY-CCTY NSLDS FINANCIAL AID HISTORY          #Processed: MM/DD/CCTY
This page contains your previous financial aid information, which is contained in the
National Student Loan Data System (NSLDS). Your Financial Aid Administrator will use
it to determine your eligibility.
*****
#Discharged #Fraud #Defaulted #Loan Sat. #Active #Post Screening #TRACH
Loan FlagY1 LoanY1 LoanY2 RepaymentY1 BankruptcyY1 Reason: 99 99 99 LoanY1
Unusual Enrollment History: ; #Overpayment: Contact: LSU % Lifetime
ACT:
PELL: X XXXXXXXXXXXXXXXX 9999 9999 Limit Flag X
NEMBAW: X 99999999
TEACH: X 99999999
Iraq and Afghanistan Service Grant: X 99999999
FSEOG: X
PERKINS: X
*****
```

UEH code appears here

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UEH Flag – CPS Online and eSAR

| | |
|--|---|
| NSLDS Match Flag: | Eligible for Title IV aid |
| NSLDS Database Results Flag: | Match found, NSLDS data sent |
| NSLDS Post-screening Reasons: | Not an NSLDS post-screening transaction |
| NSLDS Unusual Enrollment History Flag: | Unusual enrollment history 3 |
| NSLDS Transaction Number: | 01 |

UEH in Student Inquiry

| | |
|--|---|
| NSLDS Match Flag: | Eligible for Title IV aid |
| NSLDS Database Results Flag: | Match found, NSLDS data sent |
| NSLDS Post-screening Reasons: | Not an NSLDS post-screening transaction |
| NSLDS Unusual Enrollment History Flag: | Unusual enrollment history 3 |
| NSLDS Transaction Number: | 01 |

UEH in eSAR

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UEH – ‘C’ Codes

| NSLDS Unusual Enrollment History Flag | Description | SAR C Flag? | SAR Comment |
|---------------------------------------|--|-------------|-------------|
| 1 | For Federal Student Aid Use Only | N/A | N/A |
| 2 | Unusual Enrollment History 2 (Possible enrollment pattern problem, school may need to resolve) | Yes | 359 |
| 3 | Unusual Enrollment History 3 (Questionable enrollment pattern, school must resolve) | Yes | 360 |
| N | Enrollment pattern not unusual (No school action required) | No | N/A |
| Blank | Record not sent for match | No | N/A |

2015-2016 SAR Comment Codes and Text Guide updated July 22, 2015

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UEH – SAR Comments

| SAR Comment Code | SAR Comment Text Definition |
|------------------|--|
| 359 | Your school may request additional information to determine your eligibility for federal student aid. |
| 360 | Based upon data provided by the National Student Loan Data System (NSLDS), your school will request additional information to determine your eligibility for federal student aid and before disbursement of funds can be made. |

2015-2016 SAR Comment Codes and Text Guide updated July 22, 2015

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UEH – NSLDS Postscreening

- CPS system-generates a new transaction with Reason Code 24 for records that have a change in the NSLDS Unusual Enrollment History Flag value after the initial pre-screening

```

XXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX
99-99-9999
CCY-CCY HELDS FINANCIAL AID HISTORY                               Processed CCY/CCY
This page contains your previous financial aid information, which is contained in the
National Student Loan Data System (NSLDS). Your Financial Aid Administrator should use
it to determine your eligibility.
*****
#Discharged #Fraud #Defaulted #Loan Sat. #Active #Post Screening #TEACH
Loan Flag1 Loan2 Loan3 #Overpayment: Bankruptcy: N Reason: 99-99-99
Unusual Enrollment History: 1 #Overpayment: Contact: #Unusual Reason: X
ACT:
Pell: X XXXXXXXXXXXXXXX 9999-9999 #Unusual Flag
N.EMBAT: X 99999999 X
TEACH: X 99999999
Iraq and Afghanistan Service Grant: X 99999999
FEED: X 99999999
Deceased:
*****
    
```

If found during postscreening,
 reason code appears here

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UEH – Changes for 2015-2016

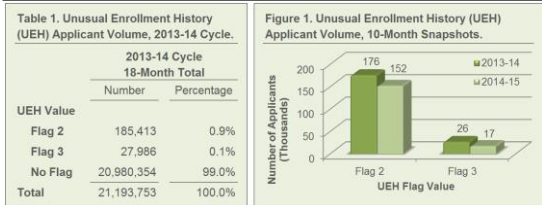
- For 2013-2014 and 2014-2015, UEH Flag was based on Pell Grant disbursement information over the prior three award years
- Beginning in 2015-2016, UEH Flag is based on both Pell Grant and Direct Loan disbursement information, over the prior four award years

Dear Colleague Letters [GEN-13-09](#) and [GEN-15-05](#)

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UEH – Flag Data

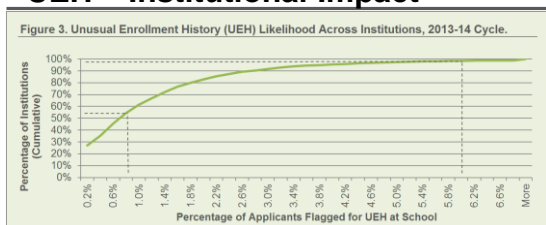


- During the 2013-14 application cycle, 1.0% of applications were flagged for having an Unusual Enrollment History (UEH)
- For the 2014-15 cycle, that figure remained at approximately the same level

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UEH – Institutional Impact

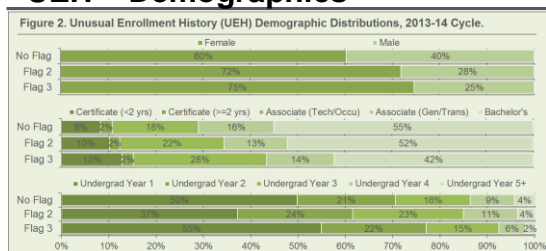


- On average, first-reported institutions on the FAFSA see about 1.1% of their applicants flagged for UEH. However, there is some variation:
 - 54% of schools have 0.8% of applicants flagged
 - Virtually all schools (99%) had no more than 6.0% of applicants flagged

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UEH – Demographics



- Overrepresented among applicants with UEH Flags are females and those pursuing certificate or associate degrees
- A large percentage of those flagged report having a freshmen grade level

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UEH – Outcomes

Table 2. Unusual Enrollment History (UEH) Disbursement Rates Among Applicants that were Previous Recipients, 2013-14.

| UEH Value | Applicants (Previous Recipients) | New grant from new school | New grant from previous school | New grant from any school | Disbursement Rate |
|-----------|----------------------------------|---------------------------|--------------------------------|---------------------------|-------------------|
| Flag 2 | 185,413 | 22,669 | 95,918 | 118,587 | 64% |
| Flag 3 | 27,986 | 3,912 | 9,416 | 13,328 | 48% |
| No Flag | 8,672,630 | 1,205,281 | 4,336,347 | 5,541,628 | 64% |
| Total | 8,886,029 | 1,231,862 | 4,441,681 | 5,673,543 | 64% |

- Applicants in the 2013-2014 cycle with a UEH Flag value of 2 saw similar disbursement rates (64%) to students with no Flag. Those with Flag 3 received aid disbursements at a much lower rate (48%).

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Reminders

- The UEH resolution process is distinct from Verification
- Schools have the option of self-selecting students for UEH review

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UEH – Flag Value ‘N’

No action is necessary

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UEH – Flag Value ‘2’ Resolution

Must review enrollment and financial aid records to determine if, during the four-award-year period (2011-2015), the student received a Pell Grant or Direct Loan *at the institution performing the review*

-  If so, no additional action is required *unless* the school suspects an Unusual Enrollment History, thereby selecting for Flag ‘3’
-  If not, must follow guidance provided for UEH Flag ‘3’

UEH – Flag Value ‘3’ Resolution

Must review the student’s academic records to determine if the student received academic credit at all institutions the student attended, including the current school, where Pell Grants or Direct Loans were received during the four-award-year period (2011-2015), as identified in NSLDS

-  If so, no additional action is required *unless* the school suspects an Unusual Enrollment History
-  If not, student is no longer eligible for Title-IV aid, but may appeal to the financial aid office for continuation

UEH – Flag Value ‘3’ Resolution

- School may rely on academic transcripts it already possesses, or obtain them from the student
 - Transcripts or grade reports need not be official
- Student may self-certify, if a transcript can genuinely *not* be obtained, that credit was *not* earned at a given institution

UEH – Student Appeals

- Student must provide documentation explaining why s/he failed to earn academic credit
- School must determine whether the documentation supports:
 - The reasons given by the student for the failure to earn academic credit, and
 - That the student did not enroll only to receive credit balance funds
- Institutional determinations are final and not appealable to the Department

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UEH – Student Appeals

Examples of possible reasons for UEH

- Personal reasons
 - Illness, family emergency, relocation, military obligation
- Academic reasons
 - Enrollment at an institution that presented unexpected academic challenges
 - The academic program did not meet the student's needs
- Third-party documentation to support the student's claims should be obtained, to the extent possible

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UEH – Student Appeals

If school approves a student appeal, it may:

- Require the student to establish an academic plan (similar to Satisfactory Academic Progress appeals)
- Require counseling on the impact of the student's attendance pattern on future Pell and Direct Loan eligibility

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UEH – Student Appeals

If school denies a student appeal:



- Student must be provided an opportunity to question and appeal the decision
- Student must be provided with information on how to regain eligibility
 - Successful completion of academic credit is the basis for a student’s request for renewal of eligibility

UEH – Eligibility after Resolution

- Eligibility for Pell Grant and Campus-Based funds begins with the *payment period* in which the student regains eligibility
- Direct Loan eligibility is retroactive to the beginning of the *enrollment period*

UEH – FAQ

If a student’s 2014-2015 ISIR included a UEH Flag of ‘2’ or ‘3’, but in 2015-2016 the UEH Flag value is ‘N’...

-  If you have previously resolved the 2014-2015 UEH Flag, no further review is required
-  If you have not satisfactorily resolved the 2014-2015 UEH Flag, you should, but are not required to, hold disbursement of Title IV aid for 2015-2016 until it is resolved
 - In doing so, you must review records for the four most recent award years

UEH – FAQ

If a student's UEH Flag of '2' or '3' is likely triggered because the student moved from undergraduate to graduate school...

- The UEH Flag must still be resolved!

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UEH – Resources

[Dear Colleague Letter GEN-13-09, March 8, 2013](#)

- UEH process and resolution of UEH Flags

[Dear Colleague Letter GEN-15-05, March 16, 2015](#)

- New expanded requirements for UEH flag in 2015-16

[2015-2016 ISIR Guide and SAR Comment Codes and Text Guide](#)

[FSA Handbook, Volume 1, Chapter 3](#)

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Thank you!

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We Appreciate Your Feedback

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• <https://www.surveymonkey.com/s/ZacharyGoodwin>

This evaluation tool provides a means to inform us of areas for improvement, and to support an effective process for listening to our customers.

Additional feedback about training can be directed to Joann.Borel@ed.gov.

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Department of Education Contacts

Research and Customer Care Center

800.433.7327
fsa.customer.support@ed.gov



Reach FSA

855.FSA.4FAA -- 1 number to reach 10 contact centers!

| | |
|---------------------------------|---|
| <i>Campus Based Call Center</i> | <i>eZ-Audit</i> |
| <i>COD</i> | <i>School Eligibility Service Group</i> |
| <i>CPS/SAIG</i> | <i>Foreign Schools Participation Division</i> |
| <i>NSLDS</i> | <i>Research and Customer Care Center</i> |
| <i>G5</i> | <i>Nelnet Total & Permanent</i> |
| | <i>Disability Team</i> |

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UEH – Data Notes

- **UEH Data: Table 1:** Data retrieved from Central Processing System (CPS). Data based on last transaction and includes rejected applications.
- **UEH Data: Table 2:** Data for the number of applicants with Flag 2 and Flag 3 retrieved from Central Processing System (CPS). Data for disbursements and for the number of previous recipients not flagged for UEH retrieved from National Student Loan Data System (NSLDS). Data based on last transaction and includes rejected applications.
- **UEH Data: Figure 1:** Data retrieved from Central Processing System (CPS). Data based on the last transaction on file through October 31 of the first year of each application cycle and includes rejected applications.
- **UEH Data: Figure 2:** Data retrieved from Central Processing System (CPS). For gender, information is student-reported with those not reporting gender excluded from analysis. For degree pursued, information is student-reported and excludes from analysis degree types ineligible for Pell grants as well as teaching credentials. For grade, information is student reported with non-undergraduate grades excluded from analysis. Data based on last transaction and includes rejected applications.
- **UEH Data: Figure 3:** Data retrieved from Central Processing System (CPS). Information based on the first-listed postsecondary institution on the application only. Data based on last transaction and includes rejected applications.

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